

Monte J. White and Associates
Monte J. White
1106 Brook Ave, Hamilton Place
Wichita Falls, TX 76301
(940)723-0099
(940)723-0096 Fax

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:

Paul Lewis Reis, Jr.
and
Marithea Evelyn Reis
DEBTORS

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§ Case No. 09-70166-HDH-13

RESPONSE TO MOTION FOR RELIEF FROM ORDER OF DISMISSAL

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Attorney, Monte J. White, in the above-titled cause and files this Response to Motion for Relief from Order of Dismissal.

On 1/21/2010, Attorney, Ron L. Yandell, on behalf of Debtors, filed a Motion for Relief from Order of Dismissal. In response thereto, Attorney, Monte J. White, would show the following:

1. Denied.
2. Denied. Since Debtor, Paul Lewis Reis, Jr., was no longer employed, there was no need for a withdrawal of the wage withholding order. Mr. Yandell should also be well aware, because of his bankruptcy experience, that should a wage withholding order need to be withdrawn it is the Chapter 13 Trustee who would initiate such withdrawal, not Debtors' attorney. Mr. Yandell never called the office of Monte J. White and Associates with a request for facts or information regarding the history or status of this case.
3. Attorney, Monte J. White, supports the reinstatement of this case, and is not opposed to the substitution of counsel by Mr. Yandell and the payment of any remaining fees due under this plan to him.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Order of Dismissal was served by ECF and/or mailed on February 1, 2010, to the following as indicated:

/s/Monte J. White

Label Matrix for local noticing

0539-7

Case 09-70166-hdh13

Northern District of Texas

Wichita Falls

Mon Feb 1 13:53:43 CST 2010

1100 Commerce Street

Room 1254

Dallas, TX 75242-1305

Bowie ISD

c/o Andrew Dylan Wood

Ray, Wood & Bonilla

P O Box 165001

Austin, TX 78716-5001

1st Nationwide-Most Funding 2

Po Box 1418

Camarillo, CA 93011-1418

Texoma Community Credit Union

3800 Sheppard Access Rd

Wichita Falls, TX 76306-4227

AT & T Wireless

PO Box 62005

Dallas, TX 75262

Arrow Fin Svcs-AFS Assignee of Cortrust

5996 W Touhy Ave

Niles, IL 60714-4610

Arrow Financial Svcs-Premier Bank

5996 W Touhy Ave

Niles, IL 60714-4610

Asset Acceptance LLC

Po Box 2036

Warren MI 48090-2036

Asset Acceptance-Dell Financial Svcs

PO Box 2036

Warren, MI 48090-2036

Atlantic Credit-HSBC

P O Box 13386

Roanoke, VA 24033-3386

Bac - Fleet Bankcard

PO Box 26012

Greensboro, NC 27420-6012

Bowie Memorial Hospital

705 E Greenwood Ave

Bowie, TX 76230-3199

Cac Financial Corp

2601 Nw Expressway

Oklahoma City, OK 73112-7236

Calvary Portfolio Services-AT & T

Attention: Bankruptcy Department

PO Box 1017

Hawthorne, NY 10532-7504

(c)CBE GROUP-DIRECTTV

131 TOWER PARK DR STE 1

WATERLOO IA 50701-9590

Citibank

8875 Aero Dr

San Diego, CA 92123-2251

Collection-Progressive Insurance

Po Box 9134

Needham, MA 02494-9134

Continental

Attn: Recovery

652 Bush River Rd

Columbia, SC 29210-7521

Credit Adjust-Collection Agency-TX Mem

2601 NW Express Way

Suite 1000 E

Oklahoma City, OK 73112-7238

Credit Solutions Corp

9573 Chesapeake Dr Ste 1

San Diego, CA 92123-1304

Executive Services-Clinics of North TX

1200 Austin St

Wichita Falls, TX 76301-4623

Executive Services-Texoma Urology

1200 Austin St

Wichita Falls, TX 76301-4623

Financial Control Svcs-Bowie-Mem Hosp

PO Box 21626

Waco, TX 76702-1626

First National Bank of Marin-Credit One

Customer Service

PO Box 98873

Las Vegas, NV 89193-8873

First Premier Bank

PO Box 5524

Sioux Falls, SD 57117-5524

Hsbc Bank

Po Box 5253

Carol Stream, IL 60197-5253

IRS Special Procedures

1100 Commerce St., Room 951

Mail Stop 5029 DAL

Dallas, TX 75242-1001

JC Penney-GE Money Bank

Attention: Bankruptcy Department

PO Box 103106

Roswell, GA 30076-9106

LVNV Funding LLC

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Lacks Furniture
2391 Ne Loop Suite 201
San Antonio, TX 78217

Midland Credit Mgmt-SW Bell
8875 Aero Dr
San Diego, CA 92123-2251

Midnight Velvet
Swiss Colony Midnight Velvet
1112 7th Ave
Monroe, WI 53566-1364

Montague CAD-City of Bowie
PO Box 121
Montague, TX 76251-0121

Montague County
c/o Sherrel K. Knighton
Linebarger Goggan Blair & Sampson,LLP
2323 Bryan Street Suite 1600
Dallas, TX 75201-2644

Monte J. White & Associates
1106 Brook Ave
Wichita Falls TX 76301-5009

NCO - Medcler-Wise Emergency Med Assoc
Attention: Bankruptcy
1804 Washington Blvd. Suite 450
Baltimore, MD 21230-1700

National Capital Management, LLC
8245 Tournament Drive
Suite 230
Memphis, TN 38125-1741

Nco Fin-09-DirectTV
507 Prudential Rd
Horsham, PA 19044-2308

PRA Receivables Management, LLC
As Agent Of Portfolio Recovery Assocs.
c/o Credit One Bank,n.a.
POB 41067
NORFOLK VA 23541-1067

PRA Receivables Management, LLC
As Agent Of Portfolio Recovery Assocs.
c/o Orchard Bank/Non Prime
POB 41067
NORFOLK VA 23541-1067

Paragonway-Lacks
2101 West Ben Whit
Austin, TX 78704-7516

Portfolio Recoveries-Collect America
Attention: Bankruptcy Department
PO Box 12914
Norfolk, VA 23541-0914

Portfolio Recovery-HSBC
120 Corporate Blvd Ste 1
Norfolk, VA 23502-4962

RJM Acquisitions Funding LLC
575 Underhill Blvd
Suite 224
Syosset, NY 11791-3416

Radiology of North Texas, P.A.
800 Rockmead Dr, Ste 210
Kingwood, TX 77339-2113

Roundup Funding, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

Swiss Colony Inc
1112 7th Ave
Monroe, WI 53566-1364

TX Emergency Staffing Solution
PO Box 96118
Oklahoma City, OK 73143-6118

Texoma Community Cr Un
Po Box 1320
Wichita Falls, TX 76307-1320

The Local Federal Credit Union
8500 N Stemmons Fwy Ste
Dallas, TX 75247-3832

(p)VANDERBILT MORTGAGE AND FINANCE INC
P O BOX 9800
MARYVILLE TN 37802-9800

West Asset Mgt-Denton Regional Med Ctr
2703 N Highway 75
Sherman, TX 75090-2567

Wise Emergency Med Assoc, PA
PO Box 830
San Antonio, TX 78293-0830

Wise Regional Health System
2000 FM 51 South
Decatur, TX 76234-3702

Marithea Evelyn Reis
689 Williamson Rd
Bowie, TX 76230-8836

Monte J. White
Monte J. White & Associates, P.C.
1106 Brook Avenue
Wichita Falls, TX 76301-5009

Paul Lewis Reis Jr.
689 Williamson Rd
Bowie, TX 76230-8836

Ronald L. Yandell
Law Offices of Ron L. Yandell
705 Eighth St., Suite 720
Wichita Falls, TX 76301-6524

UST U.S. Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-1011

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Vanderbilt Mortgage
500 Alcoa Trail
Maryville, TN 37804

Addresses marked (c) above for the following entity/entities were corrected as required by the USPS Locatable Address Conversion System (LACS).

Cbe Group-DirectTV
131 Towe Park Dr Suite 1
Waterloo, IA 50702

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Montague County	(d)Bowie ISD c/o Andrew Dylan Wood Ray, Wood & Bonilla P. O. Box 165001 Austin, TX 78716-5001	(d)Vanderbilt Mortgage and Finance, Inc. P.O. Box 9800 Maryville, TN 37802-9800
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End of Label Matrix	
Mailable recipients	60
Bypassed recipients	3
Total	63